

Common Mistakes in HACCP



Government Agencies

Disclaimer: This information is intended to supplement Hazard Analysis and Critical Control Point training, which is available through the Sea Grant Marine Advisory Program at <http://www.uaf.edu/map/haccp.html>. Regulations are occasionally changed and subject to interpretation by consumers and agencies.

#1 Thinking you are required to have a HACCP plan

You are required to perform a hazard analysis on each of your different species and processes. You need a HACCP plan only if your hazard analysis reveals hazards that are reasonably likely to occur. A hazard analysis is not the same thing as a HACCP plan.

#2 Thinking you need a certificate of training

Attending HACCP training is one way to become familiar with HACCP information. You do not need a certificate saying you have attended training, but you do need to demonstrate to your inspector that you understand the concepts of HACCP. There is one exception: if your company is a participant in the U.S. Department of Commerce HACCP/Quality Management Program you will be required to have someone in the facility who has successfully completed their training.

#3 Not having a HACCP trained—or equivalent—person reviewing your HACCP records

The person who reviews the HACCP records is required to be knowledgeable about HACCP, whether through training or self-taught, as above. HACCP records must be reviewed within one week of the day that the records are made. Unless your vessel is heading back to port that often, you need someone on board who understands HACCP.

#4 Not reading the regulations

Reading the mere six pages of regulations will answer many of your questions. The regulations are 21 CFR parts 123.6-12, which can be found at <http://www.cfsan.fda.gov/~lrd/searule3.html> along with the rest of the Procedures for the Safe and Sanitary Processing and Importing of Fish and Fishery Products.

#5 Not reading the Good Manufacturing Practices

These sanitation guides are 21 CFR part 110, which can be found at <http://www.cfsan.fda.gov/~lrd/cfr110.html>.

#6 Being confused about the agencies who deal with seafood HACCP

- FDA—The Food and Drug Association lies under the U.S. Department of Health and Human Services, a cabinet position. The FDA is authorized to enforce the Food Drug and Cosmetic Act, which regulates the production and distribution of seafood. The FDA's seafood HACCP rule is about seafood safety only.
- USDA—The U.S. Department of Agriculture, another cabinet position, is responsible for inspecting meat from land animals, as authorized by the Federal Meat Inspection Act. Their inspection branches are the Food Safety and Inspection Service, focusing only on safety, and the Agriculture Marketing Service, who provide their inspections for a fee and include quality issues. There is a separate HACCP program for meat.
- NOAA Fisheries—The National Oceanic and Atmospheric Administration is within the U.S. Department of Commerce. Formerly called NMFS, NOAA Fisheries provides a fee-for-service seafood inspection program that includes economic integrity, quality, and wholesomeness along with seafood safety in their seafood HACCP program.
- EPA—The Environmental Protection Agency is concerned only with HACCP in that they set tolerance levels for certain food contaminants.
- ADEC—the Alaska Department of Environmental Conservation (and the safety inspection agencies in other states) has adopted the federal HACCP rule as well as imposing several rules unique to Alaska. They issue seafood processing operating permits and enforce regulations, and need to approve any new processes and technology.

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